UNITED STATES DISTRICT COURT FOR THE DISTRICT OF PUERTO RICO

In re:

THE FINANCIAL OVERSIGHT AND MANAGEMENT BOARD FOR PUERTO RICO, as representative of

PROMESA TITLE III

Case No. 17-BK-3283

THE COMMONWEALTH OF PUERTO RICO, et al.,

(LTS)

Debtors1

RE: ECF Nos. 21224,

21233

MOTION SUBMITTING CERTIFIED TRANSLATIONS OF JUDGMENTS ENTERED BY THE COURT OF FIRST INSTANCE OF PUERTO RICO IN CASE No. K AC 1991-0665 AND RELATED DOCUMENTS

To the Honorable United States District Court Judge Laura Taylor Swain:

COME NOW, the group creditors in the litigation captioned Francisco Beltran - Cintron et als v Family Department, ARV and AIJ, CASP Case No. 2021-05-0345, (the "Movant's"), by and through the undersigned attorney, to respectfully state, allege and pray:

- 1. The appearing Movants filed an Application for Allowance and Payment of Administrative Expense Priority Claims at ECF number 21224.
- 2. The Movants filed a motion at ECF number 21233 requesting leave to file the Judgments entered by the Court of First Instance of Puerto Rico in case No.

¹ The Debtors in these Title III Cases, along with each Debtor's respective Title III case number and the last four (4) digits of each Debtor's federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation ("COFINA") (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority ("HTA") (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico ("ERS") (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); and (v) Puerto Rico Electric Power Authority ("PREPA") (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

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K AC 1991-0665 in the Spanish language and related documents and requested a 30-

day term to file the certified translations.

In compliance with PR-Local District Court Rule 5, the Movants hereby 3.

submit the certified translation of the Amend Judgment and Partial Judgment

approving new pay scales, entered by the Court of First Instance of Puerto Rico in

case NO. K AC 1991-0665, and that are included as Exhibits 1-A and 1-B, and the

Stipulations entered in case No. K AC 2007-0214, and in case K AC 2009-0809

included as Exhibit 4-A and Exhibit 4-B respectively, in support of the Motion for

allowance and Payment of Administrative Priority claims.

WHEREFORE, the Movant's respectfully pray for this Honorable Court to

take notice of the filing of the certified translations of the Judgments entered by the

Court of First Instance of Puerto Rico and the stipulations of reference.

RESPECTFULLY SUBMITTED.

I HEREBY CERTIFY, that on this date, in accordance with Fed. R. Bankr. P. 9014(b), Fed. R. Bankr. P. 7004(b), we electronically filed the foregoing with the Clerk

of the Court using the CM/ECF System, which will send notification of such filing to counsels of record.

Dated: July 12, 2022, in San Juan, Puerto Rico,.

ATTORNEY FOR GROUP CREDITORS

By: ISl IVONNE GONZALEZ-MORALES

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